

Remarks

This is intended as a full and complete response to the Decision on Request for Rehearing dated July 2, 2008, having a shortened statutory period for response set to expire on September 2, 2008. Claims 1, 2, 4-6, 8-10, 12-16, 19-24, and 26 remain pending in the application and are shown above. Claims 1, 2, 4-6, 8-10, 12-16, 19-24, and 26 stand rejected by the Examiner. Please reconsider the claims pending in the application for the reasons discussed below.

Claims 1, 2, 4, 8, 9, 12-16, 20-24, and 26 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,582,578 to *Dordi et al.* in view of U.S. Patent Application No. 2003/0057098 to *Sendai et al.* Applicants respectfully traverse the rejection.

Dordi et al. and *Sendai et al.* do not teach, show, suggest, or otherwise render obvious a method for immersing a substrate comprising tilting a receiving member to a second tilt angle measured from horizontal when the substrate contacts a fluid solution, tilting the receiving member to about horizontal, and then positioning the substrate at a processing angle from horizontal that is different than the first and second angles. Similarly, *Dordi et al.* and *Sendai et al.* do not teach, show, suggest, or otherwise render obvious a method for minimizing bubble adherence to a substrate during a substrate immersion process comprising tilting the substrate to a tilt angle, reducing the tilt angle to a second angle once the substrate contacts the fluid solution, reducing the tilt angle to about horizontal, and then positioning the substrate at a processing angle different than the tilt and second angle. *Dordi et al.* and *Sendai et al.* also do not teach, show, suggest, or otherwise render obvious a method for immersing a substrate comprising tilting a contact ring to a tilt angle, reducing the tilt angle to a second angle when the contact ring initially touches the plating electrolyte, reducing the tilt angle to about horizontal, and then positioning the substrate in a processing position different than the tilt angle or the second angle. *Dordi et al.* and *Sendai et al.* do not teach, show, suggest, or otherwise render obvious a method for immersing a substrate comprising pivoting a receiving member from a first tilt angle to a second tilt angle different than the first tilt angle and then tilting the substrate held by the receiving member to a third tilt angle different than the first and second tilt angles.

Dordi et al. is silent on tilting to horizontal after immersing and before tilting to a processing position. In fact, *Dordi et al.* states that the substrate may be tilted "from horizontal as the substrate is immersed into the electrolyte solution" (See column 34, lines 43-47). *Sendai et al.* does not cure the deficiencies of *Dordi et al.* The Examiner utilizes *Sendai et al.* for electroplating a substrate at a tilt angle (See Examiner's Answer, page 12). However, the substrate angle never changes during movement of the substrate in *Sendai et al.*

Therefore, *Dordi et al.* and *Sendai et al.*, together or in combination, do not teach, show, suggest, or otherwise render obvious a method for immersing a substrate comprising tilting a receiving member to a second tilt angle measured from horizontal when the substrate contacts a fluid solution, tilting the receiving member to about horizontal, and then positioning the substrate at a processing angle from horizontal that is different than the first and second angles, as recited in claim 1 and claims dependent thereon. Similarly, *Dordi et al.* and *Sendai et al.* do not teach, show, suggest, or otherwise render obvious a method for minimizing bubble adherence to a substrate during a substrate immersion process comprising tilting the substrate to a tilt angle, reducing the tilt angle to a second angle once the substrate contacts the fluid solution, reducing the tilt angle to about horizontal, and then positioning the substrate at a processing angle different than the tilt and second angle, as recited in claim 8 and claims dependent thereon. *Dordi et al.* and *Sendai et al.* also do not teach, show, suggest, or otherwise render obvious a method for immersing a substrate comprising tilting a contact ring to a tilt angle, reducing the tilt angle to a second angle when the contact ring initially touches the plating electrolyte, reducing the tilt angle to about horizontal, and then positioning the substrate in a processing position different than the tilt angle or the second angle, as recited in claim 15 and claims dependent thereon. *Dordi et al.* and *Sendai et al.* do not teach, show, suggest, or otherwise render obvious a method for immersing a substrate comprising pivoting a receiving member from a first tilt angle to a second tilt angle different than the first tilt angle and then tilting the substrate held by the receiving member to a third tilt angle different than the first and second tilt angles, as recited in claim 23 and claims dependent thereon.

Claims 5, 6, 10, and 19 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,582,578 to *Dordi et al.* in view of U.S. Patent Application

No. 2003/0057098 to *Sendai et al.*, and further in view of U.S. Patent Application No. 2002/0084189 to *Wang et al.* Applicants respectfully traverse the rejection.

The deficiencies of *Dordi et al.* and *Sendai et al.* are described above. *Wang et al.* does not cure the deficiencies of *Dordi et al.* and *Sendai et al.* Additionally, claims 5, 6, 10, and 19 depend from claims 1, 8, and 15 and contain all of the limitations of the claims from which they depend. Therefore, it is respectfully asserted that claims 5, 6, 10, and 19 should be allowable for at least the same reasons as claims 1, 8, and 15. Withdrawal of the rejection is respectfully requested.

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicants respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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